1	VANESSA M. TURLEY, ESQ.						
2	Nevada Bar No. 14635						
3	TROUTMAN PEPPER HAMILTON SANDERS LLP 8985 S. Eastern Ave., Ste. 200						
	Las Vegas, NV 89123 (Nevada Office) Tele: (470) 832-5572						
4	Fax: (404) 962-6800						
5	vanessa.turley@troutman.com						
6	TROUTMAN PEPPER HAMILTON SANDER	AS LLP					
7	600 Peachtree St. NE #3000 Atlanta, GA 30308 (Corporate Office)						
8	Attorneys for Defendant Nationstar						
9	Mortgage LLC, dba Mr. Cooper						
10	UNITED STATES DISTRICT COURT						
11	DISTRICT	DISTRICT OF NEVADA					
12	SFR INVESTMENTS POOL 1, LLC,						
13		Case No. 2:22-cv-00534-GMN-NJK					
14	Plaintiff,	STIPULATION AND ORDER TO EXTEND					
15	VS.	RESPONSE DEADLINES AND VACATE HEARING					
	NATIONSTAR MORTGAGE, LLC d/b/a						
16	MR. COOPER; FEDERAL NATIONAL MORTGAGE ASSOCIATION; DOES I	(THIRD REQUEST)					
17	through X; and ROE BUSINESS ENTITIES I through X, inclusive,						
18							
19	Defendants.						
20							
21		C ("SFR") and Defendants, Nationstar Mortgage					
22	LLC d/b/a Mr. Cooper ("Nationstar") and Federal National Mortgage Association ('Fannie Mae"						
23	(collectively, the "Parties"), by and through the	ir undersigned counsel, hereby stipulate and agree					
24	to extend briefing deadlines on SFR's Emerger	ncy Motion for Temporary Restraining Order and					
25	Preliminary Injunction ("Motion") [ECF No. 7,	8]. The Parties further stipulate and agree that the					
26	foreclosure sale on the subject property be post	poned until this Court rules on SFR's Motion. The					
27	parties finally agree to extend the date for Nat	ionstar to file a response to SFR's Complaint. Ir					
28	support of the stipulation, the Parties state as follows: -1-						
	126742634						

- 1. On March 28, 2022, SFR Investments Pool 1, LLC ("SFR") filed the Complaint in the instant matter. [ECF No 1].
- 2. On March 30, 2022, SFR filed an Emergency Motion for Temporary Restraining Order and Preliminary Injunction ("Motion"). [ECF No. 7, 8].
- 3. On April 1, 2022, this Court entered a minute order in chambers setting a deadline for Defendants to respond to the Motion no later than Monday, April 4, 2022 at 5:00 p.m. and further ordering an in person hearing on the Motion for Tuesday, April 5, 2022, at 3:00 p.m. [ECF No. 8].
- 4. On April 4, 2022, this Court entered an order extending the deadline for Nationstar to respond to the motion for preliminary injunction to April 13, 2022 and setting the deadline for SFR to file a reply in support of its motion for April 20, 2022. {ECF No. 12]
- 5. In late March 2022 one of the attorneys for Troutman Pepper representing Nationstar, Aaron Lancaster, left the firm leaving the remaining counsel unable to adequately cover all Nationstar cases assigned to Mr. Lancaster including this matter. On April 11, 2022, attorney Vanessa Turley was hired to represent Nationstar in this and several other matters in Nevada. Ms. Turley needs time to train in her new position, to research this case and SFR's claims, and to respond to the motion for preliminary injunction and the Complaint.
- 6. The Parties agree Defendants shall have until June 24, 2022, to file a response to the Motion for Preliminary injunction, allowing counsel adequate time to evaluate the case and respond to the Motion and to further allow the Motion to be briefed in the normal course pursuant to LR 7-2.
- 7. Pursuant to LR 7-2, SFR shall have seven days after service of Defendants' Response to file a reply in support of its Motion.
- 8. Defendants agree to refrain from setting the foreclosure sale of the real property located at 6171 Fox Creek, Las Vegas, NV 89122, Parcel No. 161-15-212-175 until such time as this Court rules on the Motion.

# 

1	9. Finally, the Parties agree that Nationstar shall have until June 24, 2022, to file					
2	response to SFR's Complaint.					
3	10. Both parties represent this stipulation is not made with any intent to delay or					
4		prejudice either party.				
5	DATED thi	s 3rd day of June, 2022.	DATED this 3rd day of June, 2022.			
6	Troutman	Pepper Hamilton Sanders LLP	Hanks Law Group			
7 8 9 10 11 12 13 14 15 16 17	Nevada Bar 8985 S. Eas Las Vegas, Counsel for	Turley, Esq. No. 14635 Stern Avenue, Suite 200 NV 89123 Nationstar Mortgage, LLC oper and Federal National Association  IT IS SO Of Dated this	Chantel M. Schimming Chantel M. Schimming, Esq. Nevada Bar No. 8886 7625 Dean Martin Drive, Suite 110 Las Vegas, NV 89139 Counsel for SFR Investments Pool 1, LLC  RDERED.  day of June, 2022.  Javarro, District Judge			
19 20	UNITED STATES DISTRICT COURT					
21						
22						
23						
24						
25						
26 27						
28	126742634	-	3-			
	126742634					

#### Case 2:22-cv-00534-GMN-NJK Document 16 Filed 06/07/22 Page 4 of 6

**Archived:** Friday, June 3, 2022 12:30:03 PM

From: <u>Turley</u>, <u>Vanessa M</u>.

Mail received time: Fri, 3 Jun 2022 11:58:01

Sent: Fri, 3 Jun 2022 15:58:00

To: Kusch, Janet Owen

Subject: FW: Backdated Property Payoff Quotes - Drafi, Paguia, Schwartz

Importance: Normal Sensitivity: None

Hi,

Can you change the below and submit the following SAOs:

- 1. Drafi
- 2. DiPietro
- 3. Paguia
- 4. Schwartz

They are all in iManage under pleadings (should be the first thing)

Thanks!!!

## Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

From: Chantel Schimming <chantel@hankslg.com>

Sent: Friday, June 3, 2022 11:56 AM

To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Karen Hanks <karen@hankslg.com>

Cc: Candi Fay <candi@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>;

Wight, Brody R. <Brody.Wight@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>

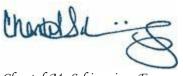
Subject: RE: Backdated Property Payoff Quotes - Drafi, Paguia, Schwartz

#### **EXTERNAL SENDER**

Vanessa,

Change the signature line on Meadow Hill from Karen to me and you can use my e-signature on each of the SAO's.

Thanks, Chantel



Chantel M. Schimming, Esq. Associate Attorney

#### HANKS LAW GROUP

7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Telephone: (702) 758-8434 Fassimile: (725) 239-3415

mail to: <a href="mailto:chantel@hankslg.com">chantel@hankslg.com</a> <a href="http://www.hankslg.com">http://www.hankslg.com</a>

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From: Turley, Vanessa M. < Vanessa. Turley@troutman.com >

**Sent:** Friday, June 3, 2022 8:44 AM

To: Chantel Schimming <<u>chantel@hankslg.com</u>>; Karen Hanks <<u>karen@hankslg.com</u>>

Cc: Candi Fay <candi@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>;

Wight, Brody R. < <a href="mailto:Brody.Wight@troutman.com">Brody.Wight@troutman.com</a>; Streible, Elizabeth M. < <a href="mailto:Elizabeth.Streible@troutman.com">Elizabeth.Streible@troutman.com</a>

**Subject:** RE: Backdated Property Payoff Quotes - Drafi, Paguia, Schwartz

Hi all,

Happy Friday! Sorry to keep the emails coming, but here are the revised SAOs for: Schwartz/Meadow Hill; DiPietro/Brilliant Summit; Paguia/Fox Creek; and Drafi/Cantina Creek with the payoff quote paragraph omitted. Please let me know if I may affix your e-signature to the Stipulations.

Thank you,

# Vanessa M. Turley Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

From: Turley, Vanessa M.

**Sent:** Friday, June 3, 2022 11:26 AM

To: 'Chantel Schimming' <chantel@hankslg.com>; Karen Hanks <karen@hankslg.com>

Cc: Candi Fay <<u>candi@hankslg.com</u>>; STAFF HANKSLG <<u>staff@hankslg.com</u>>; Balser, Justin D. <<u>Justin.Balser@troutman.com</u>>;

Wight, Brody R. < Brody. Wight@troutman.com >; Streible, Elizabeth M. < Elizabeth. Streible@troutman.com >

**Subject:** Backdated Property Payoff Quotes - Drafi, Paguia, Schwartz

Hi Chantel,

#### Case 2:22-cv-00534-GMN-NJK Document 16 Filed 06/07/22 Page 6 of 6

Attached are the payoff quotes for the three properties where NRS 107.200 requests were made. We were able to obtain the backdated payoff quotes *as of the day of the request*. I hope this allows you to further consider payoffs for these properties. Please let me know if you have any questions or concerns.

#### Thanks!

Case Name:	NRS 107.200 request made:	Date Request Made:	Date Statement/Note was due:	NSWMRC file number:	Fannie Mae file number:
1. Drafi	Yes	October 13, 2021	November 3, 2021	608802849	1700949269
2. Paguia	Yes	November 22, 2021	December 13, 2021	658853635	4005608009
3. Schwartz	Yes	October 12, 2021	November 2, 2021	607403490	1701661194
4. Sinagulia	No			660636630	1682856593

### Vanessa M. Turley

**Attorney** 

Direct: 470.832.5572

vanessa.turley@troutman.com

troutman pepper

c/o 600 Peachtree Street, NE, Suite 3000 Atlanta, GA 30308 troutman.com

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